- 8 -

AMENDMENTS TO THE DRAWINGS

The attached sheet of drawings includes changes to Figs. 6 and replaces the original sheets including such figure. Figure 6 has been changed to depict typed references instead of handwritten references.

Attachment(s):   Replacement Sheet including amended Fig. 6.

REMARKS

This paper is responsive to a Non-Final Office action dated November 10, 2005. Claims 1-30 were examined. A non-narrowing amendment has been made to claim 25 to cure an antecedent basis error. Claims 1 and 12 have been amended.

Preliminary Matters

In response to the "Interpretation Section" of the Office Action, Applicants respectfully submit that the claims define the scope of the invention. The scope of the invention is not defined by the "Interpretation Section" of the Office Action.

Rejections under 35 U.S.C. §103

Claims 1- 30 are rejected under 35 U.S.C. §103(a) as being unpatentable over JAVADOC as documented by "The Design of Distributed Hyperlinked Programming Documentation," by Lisa Friendly (Friendly), of Sun MicroSystems Inc, 1995 in view of United States Patent No. 5,857,212, naming Michael Van de Vanter et al. as inventors (Van de Vanter). Applicants traverse all of the rejections, at least because the Office has failed to establish *prima facie* obviousness.

A. The Friendly Reference

The Office relies on Friendly and Van de Vanter. The reliance on Friendly is misplaced. JavDoc parses code to generate HTML documentation for the code from comments in the code that are delimited with /** and */. The Appendix of Friendly, which is repeatedly referred to in the rejections, discloses printed sample source code with comments and HTML documentation generated from the comments in the code. Friendly does not disclose or suggest presentation of code, or transition in behavior of code presentation. Although Friendly discloses a source code with Java code, HTML code, and comments, Friendly does not disclose a transition in presentation behavior between these different lexical contexts.

-9-

B. Failure to Establish Prima Facie Obviousness

"To reject claims in an application under section 103, an examiner must show an unrebutted *prima facie* case of obviousness." In re Rouffet, 149 F.3d 1350, 47 U.S.P.Q.2d (BNA) 1453 (Fed. Cir 1998). It must be shown that all limitations of the claims are taught or suggested by the references as combined or modified to establish this *prima facie* case of obviousness. *See* In re Royka, 490 F.2d 981, 180 U.S.P.Q. 580 (CCPA 1974).

The Office has failed to show that each and every limitation of the claims has been taught or suggested by Friendly and Van de Vanter. The claims recite the following:

Claim 1: "transition of the behavior from that in accordance with a first lexical context to that in accordance with a second lexical … without use of a structural command to the interactive software engineering tool **while maintaining a pre-existing lexical context past an insertion point of the opening boundary token in an edit buffer**"

Claim 7: "**display of edit buffer content past the cursor position maintains its pre-introduction association with a first lexical context and with linguistically-driven typography** therefor, while subsequent entry at the cursor position is subject to a second lexical context"

Claim 12: "in response to said recognition of said opening boundary token, creating a second lexical context operative for subsequent interactive entry at the insertion point, **wherein the second lexical context is delimited by said opening boundary token and a position in the source code immediately following the insertion point while maintaining a pre-existing lexical context past the insertion point**"

Claim 25: "invokes the second language context nested within the first language context based solely on recognition of a boundary token defined by the first language context and entered at a cursor position, **while maintaining pre-existing language context past the cursor position**"

Claim 30: "associates text subsequently entered into the buffer at an insertion point thereof with a second language context, **while maintaining a pre-existing association between the first language context and contents of the buffer past the insertion point**"

- 10 -

To reject the claims, the Office refers to three different sections of Van de Vanter. The first section (col. 7, lines 59 – 64), defines a syntactic context, which does not disclose or suggest any of the above quoted limitations. The second section, which is the background section, relied upon by the Office discloses features of conventional text editors. Applicants' specification clearly outlines the shortcomings of conventional textual program editors and structural program editors. *See* Applicants' specification [0008] – [0019]. Structural editors required input of a structural command. *See* Applicants' specification [0017] – [0019]. Textual editors were unstable, and did not properly handle edits. Textual editors failed to maintain pre-existing lexical contexts. For example, if a line of code is edited to add a string literal, conventional textural editors would apply stylistic rules for a string literal to the contents of the edit buffer past the insertion point of the double quotes, thus disrupting presentation behavior of current content in accordance with pre-existing lexical contexts. *See* Applicants' specification [0008] – [0016].

Finally, the third section of Van de Vanter (col. 28, line 63 – col. 29, line 2) relied upon by the Office to reject the independent claims discloses automatic creation of a string literal object including a closing quote by a keystroke editor in response to a user typing an opening quote. Van de Vanter does not disclose or suggest maintaining an association between a first lexical context and edit buffer content beyond an insertion point of the opening quote. Hence, Van de Vanter fails to disclose or suggest the above quoted limitations of claims 1, 7, 12, 25, and 30.

Neither Friendly nor Van de Vanter, standing alone or in combination, disclose or suggest any of the independent claims. Therefore, the independent claims are allowable over the art of record. In addition, the art of record fails to disclose or suggest the claims dependent upon respective ones of the allowable independent claims.

Conclusion

In summary, claims 1 – 30 are in the case. All claims are believed to be allowable over the art of record, and a Notice of Allowance to that effect is respectfully solicited. Nonetheless, if any issues remain that could be more efficiently handled by telephone, the Examiner is requested to call the undersigned at the number listed below.

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- 12 -